

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Civil Action No. 2:23-cv-00352-JRG-RSP

JOINT MOTION TO EXTEND FILING DEADLINE FOR MOTIONS *IN LIMINE*

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group, Inc. (collectively, “Verizon”), (collectively, the “Parties”), respectfully file this Joint Motion to Extend the Filing Deadline for Motions *in Limine* and would show the Court as follows:

Per the Third Amended Docket Control Order, the current deadline for the parties to file motions *in limine* is April 28, 2025. *See* Dkt. No. 145 at 3. At this time, the Parties request a brief extension of this deadline to May 1, 2025. The deadline for responses to motions *in limine* shall remain the same as that set forth in the Docket Control Order, which is May 12, 2025. *Id.* at 2.

The Parties seek this brief extension to accommodate the other deadlines in this case this week, including the deadline to serve objections to pretrial disclosures and rebuttal pretrial disclosures, which is April 29, 2025, and the deadline for reply briefs in support of motions for summary judgment and motions to strike expert testimony (including *Daubert* motions), which is April 30, 2025. *Id.* at 3; Dkt. No. 170. This brief extension will also allow the Parties to incorporate any relevant information from either of those exchanges and/or filings in their motions

in limine for the sake of completeness.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The parties further represent this will not affect any of the starred dates in the Docket Control Order. The Parties have corresponded and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

Dated: April 28, 2025

/s/ *Marc Fenster*

CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com
Ben Wang
CA State Bar No. 228712
Email: bwang@raklaw.com
Adam Hoffman
CA State Bar No. 218740
Email: ahoffman@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Paul Kroeger
CA State Bar No. 229074
Email: pkroeger@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
Email: nrubin@raklaw.com
Kristopher Davis
CA State Bar No. 329627
Email: kdavis@raklaw.com
James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com
Philip Wang
CA State Bar No. 262239
Email: pwang@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com
Qi (Peter) Tong
TX State Bar No. 24119042
Email: ptong@raklaw.com

RUSS AUGUST & KABAT
12424 Wilshire Blvd., 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

Andrea L. Fair

/s/ *Josh A. Krevitt*

Josh A. Krevitt
jkrevitt@gibsondunn.com
Katherine Q. Dominguez
kdominguez@gibsondunn.com
Brian Rosenthal
brosenthal@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

Robert Vincent
rvincent@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, Texas 75201-2923
Telephone: (214) 698-3100
Facsimile: (214) 571-2900

Andrew Robb
arobb@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
310 University Avenue
Palo Alto, CA 94301
Telephone: (650) 849-5300

Deron R. Dacus
ddacus@dacusfirm.com
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Phone: 903.705.1117

Attorneys for Verizon

MILLER FAIR HENRY PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: 903-757-6400
andrea@millerfairhenry.com

*Attorneys for Plaintiff
Headwater Research LLC*

CERTIFICATE OF CONFERENCE

I hereby certify that, on April 27, 2025, counsel for Verizon conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Josh A. Krevitt
Josh A. Krevitt

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Josh A. Krevitt
Josh A. Krevitt